

**Exhibit 4**  
**Plaintiff Jane Doe September 29, 2023**  
**Deposition Transcript Excerpts**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF ALABAMA  
3 WESTERN DIVISION

4 JANE DOE #1 and JANE DOE #2 on behalf of  
5 themselves and all others similarly  
6 situated,

7 Plaintiff,

8 CIVIL ACTION NUMBER

9 VS.

7:21-CV-00220

10 HONORABLE L. SCOTT COOGLER

11 MG FREESITES, LTD, d/b/a "PORNHUB"; MG  
12 FREESITES II, LTD; MINDGEEK S.A.R.L.;  
13 MINDGEEK USA INCORPORATED; MG CY HOLDINGS  
14 LTD; MINDGEEK CONTENT RT LIMITED;  
15 9219-1568 QUEBEC, INC., d/b/a MINDGEEK; MG  
16 BILLING LTD,

17 Defendants.

18 VIDEOTAPED DEPOSITION

19 OF

20 S T I P U L A T I O N S

21 IT IS STIPULATED AND AGREED by and  
22 between the parties through their  
23 respective counsel that the videotaped  
deposition of:

1 [REDACTED],  
2 may be taken before Carol J. Reyer, a  
3 Certified Stenographic Court Reporter and  
4 Notary Public for the State of Alabama at  
5 Large, at the Zarzaur Law Firm, 2332 2nd  
6 Avenue North, Birmingham, Alabama, on the  
7 29th day of September, 2023, commencing at  
8 approximately 10:37 a.m.

9 In accordance with Rule 5(d) of  
10 the Federal Rules of Civil Procedure, as  
11 amended, effective May 15, 1988, I, CAROL  
12 J. REYER, am hereby delivering to KATHLEEN  
13 N. MASSEY, the original transcript of the  
14 oral testimony taken the 29th day of  
15 September, 2023, along with exhibits.

16 Please be advised that this is the  
17 same and not retained by the Court  
18 Reporter, nor filed with the Court.  
19  
20  
21  
22  
23

1       those are the only people that I  
2       personally can recall that seen it among  
3       the 2,000-something people that was listed  
4       earlier.

5               Q. Are you aware of any re-uploads of  
6       that video to Pornhub or any other site?

7               A. Not to my knowledge, but it's  
8       definitely a genuine fear.

9               Q. What about the video that was made  
10      in the hotel room? Are you aware of that  
11      having been uploaded to Pornhub or  
12      anywhere else?

13              A. Not to my knowledge, but like I  
14      said, it's something to be fearful about.

15              Q. So we've -- we've talked about the  
16      two videos. The one we were just talking  
17      about now was a video entitled, pardon my  
18      language, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
19      [REDACTED] [REDACTED] [REDACTED] is that correct?

20              A. This is the first I'm hearing of  
21      that title, is from you, ma'am.

22              Q. I'm sorry about that.

23                      But this is the video that you are

1 MR. ZARZAUR: Object to the form.

2 Q. You can answer.

3 A. I'm just going to say that  
4 children and adults don't sound the same.  
5 They don't look the same. My sounds  
6 wasn't of an adult. They were of a child.  
7 And so that would be what I would say, my  
8 screams.

9 Q. You testified earlier that the  
10 video included an image of your calf. Was  
11 there anything about your calf to suggest  
12 that you were underage?

13 A. I mean, I'd say no, but it wasn't  
14 my job to have to know it either.

15 Q. I'm just asking for your opinion  
16 of what the content depicted.

17 So this -- this video that we're  
18 talking about now you've testified was  
19 recorded in late [REDACTED] [REDACTED] [REDACTED],  
20 correct?

21 A. That's correct.

22 Q. How old were you at that time?

23 A. Depending on when it was recorded,

1 I was either 16 or 17. My birthday is in  
2 [REDACTED] so I can't be 100 percent sure,  
3 but ...

4 Q. So 16 or 17 in this video?

5 A. That's correct.

6 Q. And what is it about your  
7 screaming in this video when you were 16  
8 or 17 that indicated it was the scream of  
9 an underage person?

10 A. (No response.)

11 Q. Can you think of anything sitting  
12 here today?

13 A. I know as I've gotten older my  
14 voice has deepened [phonetic]. It's, I  
15 don't know how to describe, but stout. I  
16 have a stouter voice. And I know at the  
17 time I didn't have as much raspy to the  
18 voice, so that would be my answer. Not as  
19 raspy, not as whole. More squeal-like  
20 that you hear most kids playing on a  
21 playground squealing, and that's what I  
22 would say.

23 Q. You think there was a big enough